

**OFFICE OF THE FEDERAL PUBLIC DEFENDER
DISTRICT OF MARYLAND**

NORTHERN DIVISION
TOWER II, 9TH FLOOR
100 SOUTH CHARLES STREET
BALTIMORE, MARYLAND 21201-2705
TEL: (410) 962-3962
FAX: (410) 962-0872
TOLL FREE: (855) 213-8450

JAMES WYDA
FEDERAL PUBLIC DEFENDER

SHARI SILVER DERROW
ASSISTANT FEDERAL PUBLIC DEFENDER

VIA CM/ECF

April 25, 2022

The Honorable Beth P. Gesner
United States District Court
for the District of Maryland
101 West Lombard Street
Baltimore, Maryland 21201

Re: *United States v. Mark Unkenholz*
Criminal Case No. JKB-22-0105

Dear Judge Gesner:

I write to request a modification of Mr. Unkenholz's pretrial release conditions by permitting him to travel to Oregon for day trips while he is visiting his family in Washington State. Assistant U.S. Attorney P. Michael Cunningham does not object to the proposed modification. U.S. Pretrial Officer Celine Ferguson also does not object to the proposed modification.

As the Court knows, Mr. Unkenholz first appeared before the Court on March 31, 2022, and was released on conditions, including a condition restricting his travel to Maryland and Washington State, where members of his family reside. *See* ECF No. 12. While visiting his loved ones in Washington State, Mr. Unkenholz would like to make day trips to nearby Oregon, which is located driving distance from his family's home.

Accordingly, Mr. Unkenholz respectfully requests that the Court grant the unopposed request to modify his release conditions by permitting him to travel to Oregon for day trips. All other conditions would remain in effect. I thank the Court for its attention to this matter.

Sincerely,

/s/

Shari Silver Derrow
Assistant Federal Public Defender

APPROVED this ____ day of April, 2022,

Honorable Beth P. Gesner
United States Magistrate Judge